

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW MEXICO

FILED  
at 2:46 o'clock P M

AUG 08 2019

United States Bankruptcy Court  
Albuquerque, New Mexico

IN RE:

STEPHEN GUAJARDO

ROBERTA GARCIA-GUAJARDO,

Debtors.

Case No. 19-10540-TA13

DEBTOR'S MOTION FOR OBJECTION OF WITHDRAW OF COUNCIL

COMES NOW, Debtors Stephen D. Guajardo and Roberta L. Garcia-Guajardo ("Debtors"), appearing as Pro Se Litigants, and hereby states in support of Debtor's Motion for Objection of withdrawal of counsel for the following:

1. Agreed
2. Object, On June 4, 2019 after speaking to the trustee, Ron Holmes in the downstairs lobby advised us that the court had granted us until July 31, 2019 to get our tax refilling's into the court. Ron Holmes also stated that even though we had a July 31, 2019 deadline, he wanted a copy of the paperwork 2 weeks earlier which was July 17, 2019. (However, Ron Holmes never told us that if we could not get this paperwork to him by July 17, 2019 that he would withdraw as counsel).

We told Ron Holmes at the same time that we were awaiting the transcripts from the IRS and as soon as we received them that we would process the refilling's just based on the transcripts to get the job done.

Ron Holmes said no, you need to use every deduction so you can minimize your debt.

Therefore, in compliance with Ron Holmes request, we had to wait on transcripts from the IRS, since my husband could not answer their

RELIEF

Debtors, conclude that we have not in consciousness tried to intentionally frustrate Ron Holmes, in fact we took his advice, we filed with all deductions to minimize our debt. However, if we would have filed as originally planned just based on the IRS transcript, we would have had the filings done within days.

We feel that Ron Holmes has agreed to continue as our attorney but we have not been able to get clarification on the motion to withdraw.

If Ron Holmes continues with his withdrawal as counsel it will make it impossible to find another attorney to take our case and will adversely affect the outcome of our bankruptcy. We again, have communicated the fact that we have tried to comply with his requests and as of today have done so. It was never our intention to frustrate him in anyway.

WHEREFORE, Debtors respectfully request this Court deny this Motion to Withdraw and grant any such further relief as the Court deems just and proper.

Respectfully submitted, by

  
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Stephen D. Guajardo, Pro Se Litigant  
\_\_\_\_\_  
Roberta L. Garcia-Guajardo, Pro Se Litigant

P. O. Box 602

Belen, NM 87002

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CERTIFICATION OF MAILING

I hereby certify that a true and correct copy of the foregoing was electronically transmitted to the following:

- Tiffany M. Cornejo courtemail@ch13nm.com,  
courtemailbu@ch13nm.com
- Ronald E. Holmes rholmes@davismiles.com
- James C. Jacobsen jjacobsen@nmag.gov, jotero@nmag.gov
- Eric Mark Sommer erics@sommerudall.com,  
shelbys@sommerudall.com:jvw@sommerudall.com;  
baf@sommerudall.com
- United States Trustee ustpreion20.aw.ecf@usdoj.gov

I hereby certify that a true and correct copy of the foregoing was mailed to the following:

Estevan Sanchez

POB 1984

Santa FE< NM 87504-1984

Synchrony Bank C/o PRA Receivables Mgmt LLC

POB 14401

Norfolk, VA 23541

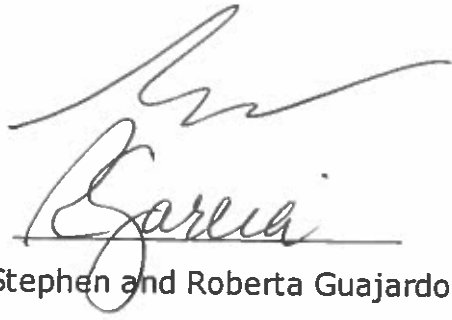
Roberta Garcia-Guajardo

Stephen Guajardo

POB 602

Belen, NM 87002

On this 24<sup>th</sup> day of July, 2019.



Stephen and Roberta Guajardo